

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
vs.) NO. 03-30047-MAP
)
MELVIN RICHARDSON)

MOTION TO WITHDRAW AS COUNSEL

Now comes counsel for the defendant respectfully requests this Honorable Court allow him to withdraw from representing the defendant any further relative to this criminal case. Counsel also requests to withdraw so that appellate counsel can be appointed to pursue various appellate issues.

As grounds for this request counsel states there are several issues which have arisen which would make it impossible to represent the defendant without conflict.

Counsel further states the defendant is unable to retain any private counsel for appellate matters.

The defendant further relies upon his attached affidavit file under seal.

Respectfully submitted,

DEFENDANT

BY:/s/ Vincent A. Bongiorno, Esq.
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Springfield, MA 01103
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BBO #049040

CERTIFICATE OF SERVICE

I, Vincent A. Bongiorno, Esq., do hereby certify that I have served a copy of the foregoing via CM/ECF to United States Attorney, Paul Smyth, 1550 Main Street, Springfield, MA 01103 this 25 day of October 2006.

/s/ Vincent A. Bongiorno